1	FRANCIS O. SCARPULLA (41059)		
2	CRAIG C. CORBITT (83251) CHRISTOPHER T. MICHELETTI (136446) JANE YI (257893) ZELLE HOFMANN VOELBEL & MASON LLP 44 Montgomery Street, Suite 3400 San Francisco, CA 94104		
3			
4			
5	Telephone: (415) 693-0700 Facsimile: (415) 693-0770		
6	fscarpulla@zelle.com ccorbitt@zelle.com		
7	Lead and Liaison Counsel for		
8	Indirect Purchaser Class		
9	UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF CALIFORNIA		
10			
11	OAKLAND DIVISION		
12	IN RE STATIC RANDOM ACCESS	Case No. 4:07-md-1819 CW	
13	MEMORY (SRAM) ANTITRUST LITIGATION	MDL No. 1819	
14		STIPULATION AND ORDER TO EXTEND	
15	This Document Relates to: ALL INDIRECT PURCHASER ACTIONS	TIME FOR NON-PARTIES F5 NETWORKS, INC. AND CDW CORPORATION TO FILE DOCUMENTS IN SUPPORT OF PLAINTIFFS' JOINT ADMINISTRATIVE MOTION TO SEAL DOCUMENTS PURSUANT TO CIVIL	
16			
17	ALL INDIRECT FURCHASER ACTIONS	LOCAL RULES 7-11 AND 79-59(d) AND GENERAL ORDER NO. 62	
18		GENERAL ORDER NO. 02	
19	WHEREAS, on August 24-25, 2010, Indirect Purchaser ("IP") Plaintiffs served, among other		
20	documents, their Memorandum in Opposition to Samsung's Motion for Summary Judgment And/Or		
21	Partial Summary Judgment along with the Declaration of Christopher T. Micheletti in Support of		
22	Oppositions to Dispositive Motions and exhibits thereto ("Micheletti Declaration"), including the		
23	Corrected Expert Report of Michael J. Harris, Ph.D., dated May 6, 2010, and all exhibits thereto		
24	(submitted as Exhibit 1 to the Micheletti Declaration), the Corrected Expert Report of Mark Dwyer,		
25	Ph.D., dated May 5, 2010, and all exhibits thereto (submitted as Exhibit 2 to the Micheletti		
26	Declaration), and data and information pertaining to f5 Networks, Inc., some of which data is		
27	publicly available and the remainder of which f5 has produced to the parties in the above-captioned		
28	1		
		EXTEND TIME FOR NON-PARTY F5 NETWORKS, INC. LINTIFFS' JOINT ADMINISTRATIVE MOTION TO SEAL	

DOCUMENTS PURSUANT TO CIVIL LOCAL RULES 7-11 AND 79-59(D) AND GENERAL ORDER NO. 62

litigation and which f5 has designated as "Confidential" or "Highly Confidential" (submitted as Exhibit 19 to the Micheletti Declaration);

WHEREAS, on August 24, 2010, Plaintiffs filed a Joint Administrative Motion to Seal Documents Pursuant to Civil Local Rules 7-11 and 79-5 and General Order No. 62 ("Motion to Seal") (Docket Entry ("DE") 1078), and the declaration of Jane N. Yi in support thereof;

WHEREAS, the declaration of Jane N. Yi filed in support of Plaintiffs' Motion to Seal identifies both the Direct Purchaser Plaintiffs and IP Plaintiffs' briefs and other documents that reference information which has been designated "Confidential" or "Highly Confidential" by Defendants or third parties, including, *inter alia*, IP Plaintiffs' Memorandum in Opposition to Samsung's Motion for Summary Judgment And/Or Partial Summary Judgment ("Opp. to Samsung MSJ") and certain exhibits to the Micheletti Declaration;

WHEREAS, on August 27, 2010, Plaintiffs notified f5 Networks, Inc. ("f5") that the Opp. to Samsung MSJ and Exhibits 1 and 19 to the Micheletti Declaration referred to or contained potentially confidential f5 information, and informed f5 of its responsibility pursuant to Civil Local Rule 79-5(d) to file documents in support of Plaintiffs' Motion to Seal in order to attempt to preserve the f5 materials' confidentiality;

WHEREAS, on August 31, 2010, f5 counsel advised Plaintiffs that due to an ongoing trial and the travel schedule of in-house counsel, additional time is needed to file, on or before September 10, 2010, a Declaration in Support of Plaintiffs' Motion to Seal to request that certain of f5's confidential information be kept under seal, and to lodge a proposed order granting Plaintiffs' Motion to Seal;

WHEREAS, on August 27, 2010, Plaintiffs notified CDW Corporation ("CDW") that the Opp. to Samsung MSJ and Exhibits 1 and 2 to the Micheletti Declaration referred to or contained potentially confidential CDW information, and informed CDW of its responsibility pursuant to Civil Local Rule 79-5(d) to file documents in support of Plaintiffs' Motion to Seal in order to attempt to preserve the CDW materials' confidentiality;

WHEREAS, on September 1, 2010, CDW counsel advised Plaintiffs that due to counsel's

1 impacted schedule, additional time is needed to file, on or before September 8, 2010, a Declaration 2 in Support of Plaintiffs' Motion to Seal to request that certain of CDW's confidential information be 3 kept under seal, and to lodge a proposed order granting Plaintiffs' Motion to Seal; WHEREAS, the parties agree that f5 and CDW may have until September 10, 2010 to file 4 5 documents in support of Plaintiffs' Motion to Seal, and respectfully request that the Court defer entering an Order on Plaintiffs' motion to seal until f5 and CDW's documents in support thereof 6 7 have been filed and considered. 8 NOW THEREFORE, it is hereby stipulated by the undersigned counsel on behalf of the 9 parties identified below, and subject to the Court's approval, that: f5 and CDW shall file, by September 10, 2010, documents in support of Plaintiffs' Motion to 10 Seal. 11 12 Dated: September 1, 2010 By: /s/ Christopher T. Micheletti 13 CHRISTOPHER T. MICHELETTI ZELLE HOFMANN VOELBEL 14 & MASON LLP 15 Lead and Liaison Counsel for Indirect Purchaser Class 16 Additional Defendants and Counsel: 17 MAYER BROWN LLP SHEPPARD, MULLIN, RICHTER & **HAMPTON LLP** 18 By /s/ Gary A. Winters 19 Gary A. Winters (pro hac vice) By /s/Michael W. Scarborough 20 Attorney for Defendant Michael W. Scarborough Cypress Semiconductor Corporation Attorney for Defendants 21 Samsung Electronics Company, Ltd., Samsung Semiconductor, Inc., and 22 Samsung Electronics America, Inc. 23 24 25 26 27 28

Case 4:07-md-01819-CW Document 1105 Filed 09/07/10 Page 4 of 5

1	I, Christopher T. Micheletti, hereby attest, pursuant to N.D. Cal. General Order No. 45, that
2	the concurrence to the filing of this document has been obtained from each signatory hereto.
3	
4	
5	
6	
7	
8	
9	
10	
11	
12	
13	
14	
15	
16	
17	
18	
19	
20	
21	
22	
23	
24	
25	
26	
27	
28	4
	CERTIFICATION AND INDODOCEDI ODDED EO EVEEND EINE EOD MON DADEV ES MEETWODIG INC

STIPULATION AND [PROPOSED] ORDER TO EXTEND TIME FOR NON-PARTY F5 NETWORKS, INC. TO FILE DOCUMENTS IN SUPPORT OF PLAINTIFFS' JOINT ADMINISTRATIVE MOTION TO SEAL DOCUMENTS PURSUANT TO CIVIL LOCAL RULES 7-11 AND 79-59(D) AND GENERAL ORDER NO. 62

IT IS SO ORDERED.

Dated: September 7, 2010

The Honorable Claudia Wilken United States District Judge Northern District of California

3222086v1